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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ABHIJIT BAGAL,

Plaintiff,

v.

RUTGERS, THE STATE
UNIVERSITY OF NEW JERSEY, *et
al.*,

Defendants.

Civil Action No.: 3:24-cv-11440-
ZNQ-JBD

**DEFENDANTS' NOTICE OF
MOTION TO DISMISS
PLAINTIFF'S AMENDED
COMPLAINT PURSUANT TO
RULES 12(b)(1) and 12(b)(6)**

Motion Date: April 21, 2025

Document Filed Electronically

TO: All Counsel of Record

PLEASE TAKE NOTICE that on **Monday, April 21, 2025 at 10:00 a.m.**,

or as soon thereafter as counsel may be heard, Defendants Rutgers, the State
University of New Jersey (“Rutgers”), Jonathan Holloway, Jeffrey Robinson,

Enobong (Anna) Branch, Jaqueline S. Mattis, Lucille Foster, Corrine Castro, and Audrey Truschke (collectively, “Defendants”) shall appear before the Honorable Zahid N. Quraishi, U.S.D.J. at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Courtroom 4W, Trenton, New Jersey 08608, and shall move this Court for an Order dismissing Plaintiff Abhijit Bagal’s (“Plaintiff”) Amended Complaint (ECF No. 6) against them pursuant to Federal Rules of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction and 12(b)(6) for failure to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, the Defendants shall rely upon their Brief, the Declaration of Jeffrey Soos (with exhibits), submitted concurrently herewith, any Reply papers to be submitted, and oral argument, if any. A proposed form of Order is also submitted for the Court’s consideration.

Dated: March 24, 2025

Respectfully submitted,

SAIBER LLC
Attorneys for Defendants

s/ Jeffrey Soos
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